REMARKS

Claims 1-21, 23-25, 27-35 and 37 are pending in this application. By this Amendment, the specification and claims 1, 4-5, 7, 10, 18, 21, 25, 27-32 and 34-35 are amended and claim 36 is canceled without prejudice or disclaimer. Various amendments are made for clarity and are unrelated to issues of patentability.

Entry of the amendments is proper under 37 C.F.R. §1.116 because the amendments: (1) place the application in condition for allowance; (2) do not raise any new issues requiring further search and/or consideration; and/or (3) place the application in better form for appeal, should an appeal be necessary. More specifically, the above amendments are merely for clarity and do not raise any new issues. Entry is thus proper under 37 C.F.R. §1.116.

The Office Action rejects claims 1-21, 23-25 and 27-37 under 35 U.S.C. §103(a) over U.S. Patent 6,272,545 to Flanagin et al. (hereafter Flanagin) in view of U.S. Patent Publication 2004/0139076 to Pendleton and U.S. Patent 5,999,937 to Ellard. The rejection is respectfully traversed with respect to the pending claims.

Independent claim 1 recites composing data in a first application program of a plurality of application programs embedded in the personal information terminal, the data being of a first format. Independent claim 1 also recites converting a format of the composed data from the first format to a second format suitable for a second application program of the plurality of application programs using a conversion program. Still further, independent claim 1 recites storing the format-converted data in a database associated with the second application program, wherein each of the plurality of application programs is selectively operated in the personal

information terminal, and wherein the first application program, the conversion program and the second application program are initiated and executed on the personal information terminal, the conversion program capable of converting data from any one of the plurality of application programs into data in a format of any other of the plurality of application programs.

The applied references do not teach or suggest at least these features of independent claim 1. More specifically, Flanagin, Pendleton and Ellard, either alone or in combination, do not teach or suggest features of independent claim 1 in a personal information terminal. That is, independent claim 1 relates to a plurality of application programs embedded in a personal information terminal. Independent claim 1 further recites that each of the plurality of application programs is selectively operated in the personal information terminal. However, none of the references relate to operations in a personal information terminal.

More specifically, the Office Action primarily relies on Flanagin to reject independent claim 1. However, Flanagin only briefly describes a personal information manager (PIM). See col. 11, line 57-col. 12, line 32, and PIM 5A in FIG. 6A. However, the PIM 5A is an application such as "SCHEDULE" and "OUTLOOK." Overall operations of Flanagin, which are cited in the Office Action, relate to interactions between a computer and a plurality of mobile devices. Flanagin does not suggest the respective features of independent claim 1 performed in a personal information terminal. Rather, Flanagin relates to interactions between a mobile device and a personal computer, for example.

The Office Action (on page 3) states that Flanagin's col. 12, lines 19-25 and 38-40 and col. 11, lines 4-28 teaches updating data between two different databases. However, both cited

sections relate to interactions between a mobile device 3A <u>and a desktop computer 4</u>. This does not suggest operations in a personal information terminal and/or a plurality of application programs embedded in the personal information terminal. Thus, in view of the explicit claim language within independent claim 1, the rejection should be withdrawn.

Still further, <u>Pendleton</u> relates to conversion by a server 22 of database records. See paragraph [0026], first sentence. Pendleton explicitly discloses that the server 22 processes data packets including records having different formats to and from a first computer and a second computer. See the Abstract. Pendleton does not relate to operations in a personal information terminal.

More specifically, Pendleton does not teach or suggest converting a format of the composed data from the first format to a second format suitable for a second application program of the plurality of applications (embedded in the personal information terminal) using a conversion program (initiated and executed on the personal information terminal), as recited in independent claim 1. Pendleton does not suggest converting data using a conversion program in a personal information terminal. Rather, Pendleton teaches that data must be transmitted away to a server to do the alleged conversion. Thus, Pendleton does not teach or suggest the features of independent claim 1 as alleged in the Office Action.

The Office Action dated October 19, 2006 states on page 15 that Pendleton's paragraph [0006] teaches a conversion of one data set to another at a location of the first data set. However, this cited paragraph does not suggest conversion to a second format suitable for a second application program of the plurality of application programs (embedded in the personal

information terminal) and where the second application program is initiated and executed on the personal information terminal as recited in independent claim 1. Rather, the software at the database formats the data into a format for another entity (i.e., the issuer). Thus, the software does not suggest converting into a format suitable for a second application program (embedded in the personal information terminal). Thus, the cited paragraph does not suggest the alleged features.

Still further, applicant respectfully asserts that a combination of Flanagin and Pendleton as asserted in the Office Action, would, at best, suggest that a mobile device 3A sends data to a server (as in Pendleton) and then the server forwards data to a desktop computer 4. This combination therefore does not suggest the claimed features.

Still further, Ellard discloses transferring and converting data between different entities such as a first database (having a first data set 22) and a second database ((having a second data set 24) external from the first database. This is performed by a data exchange system 26 that may be a software application executed by a computer system. See FIG. 1 and col. 3, lines 37-62. Ellard has no suggestion for performing operations in a personal information terminal. Therefore, Ellard does not teach or suggest the conversion program initiated and executed on the personal information terminal. Further, any modification of a Flanagin/Pendleton apparatus to include Ellard's teachings as alleged in the Office Action would result in a server that includes a data exchange server. Thus, the alleged combination would not teach or suggest all the features of independent claim 1.

Ellard merely discusses conversion of data from one set to a second set. There is no suggestion of how this feature may be provided within a personal information terminal. The Office Action appears to provide motivation to modify Flanagin based on Ellard at the top of page 5 of the Office Action. However, these motivations are clearly based on impermissible hindsight as there is no suggestion for these features. Furthermore, there is no suggestion that Ellard is capable of performing the various operations as recited in independent claim 1 in a personal information terminal. Rather, the Office Action merely asserts that Ellard's disclosure of converting data from one data set to a second teaches the missing features of independent claim 1. Applicant respectfully disagrees.

In view of the above, none of the references specifically relate to a method of storing data in a personal information terminal. Rather, the Office Action clearly relies on impermissible hindsight in order to combine different features. The Office Action also picks and chooses features from different references without regard to how those features are actually utilized in their respective references. Even if the references are combined, the combination still does not teach or suggest the claimed features of independent claim 1. The references as a whole do not teach or suggest the explicit language of independent claim 1. Thus, the Office Action has failed to make a *prima facie* case of obviousness with respect to independent claim 1. Furthermore, applicant respectfully submits that Flanagin, Pendleton and Ellard do not teach or suggest all the features of independent claim 1. Thus, independent claim 1 defines patentable subject matter.

Independent claim 13 recites composing data having a prescribed identifier code in a first one of a plurality of application programs, the prescribed identifier code being indicative of a

second one of the plurality of application programs into which the composed data is to be

stored. Independent claim 13 also recites selecting the second application program among the

plurality of application programs based on the prescribed identifier code using a table matching

prescribed identifier codes to corresponding application programs, converting a format of the

composed data from a first format to a second format using a conversion program, the second

format corresponding to a format required by the second application program, and storing the

converted data in a database associated with the second application program. Independent cl aim

13 also recites that each of the plurality of application programs is selectively initiated and

executed in the personal information terminal. Independent claim 13 also recites that said

converting comprises operating the first application program using a first procedure to enter data

in the first application program and operating the first application program using a second

procedure to enter data in the first application program and the second application program

database responsive to the second procedure, the conversion program capable of converting

data from any one of the plurality of application programs into data in a format of any other of

the plurality of application programs.

For at least similar reasons as set forth above, Flanagin, Pendleton and Ellard do not

teach or suggest at least these features of independent claim 13. Thus, independent claim 13

defines patentable subject matter.

Independent claim 18 recites composing data of a first format in a first one of a plurality

of application programs embedded in the personal information terminal, each of the plurality of

application programs having mutually different data formats. Independent claim 18 also recites

converting a format of the composed data to a second format used by the second application

program <u>using a conversion program</u>. Still further, independent claim 18 recites storing the

format-converted data in the second application program. Independent claim 18 also recites that

the first application program, the conversion program and the second application program are

initiated and executed <u>on the personal information terminal</u>, the conversion program capable of

converting data from any one of the plurality of application programs into data in a format of

any other of the plurality of application programs.

For at least similar reasons as set forth above, Flanagin, Pendleton and Ellard do not

teach or suggest at least these features of independent claim 18. Thus, independent claim 18

defines patentable subject matter.

Independent claim 25 recites <u>a personal data assistant (PDA)</u> that includes an

input/output interface, a central processing unit (CPU), and a memory. Independent claim 25

also recites that the memory is configured to accommodate a plurality of databases associated

with a plurality of application programs, wherein a first application program stored on the PDA

is configured to receive and store data in a first database using a first data format, a second

application program stored on the PDA is configured to receive and store data in a second

database using a second data format. Independent claim 25 also recites that a conversion

program is executed by the CPU to receive the data in the first data format, reformat the

received data to the second data format, and store the reformatted data in the second database.

Still further, independent claim 25 recites <u>the first application program, the conversion program</u>

<u>and the second application program are initiated and executed on the PDA</u>, wherein contents of

the first data format entered in the first application program in the PDA are stored as re-formatted data of the second data format in the second database in the PDA to match the second database to the first database while the first application program is executed, the conversion program capable of converting data from any one of the plurality of application programs into data in a format of any other of the plurality of application programs.

For at least similar reasons as set forth above, Flanagin, Pendleton and Ellard do not teach or suggest at least these features of independent claim 25 relating to a personal data assistant. Thus, independent claim 25 defines patentable subject matter.

Independent claim 33 recites <u>a personal data assistant (PDA)</u> that includes a first application program, a second application program, and a conversion program, configured to receive the data in the first data format, reformat the data to the second data format, and store the reformatted data in the second database. Independent claim 33 also recites that contents of the data entered in the first application program <u>in the PDA</u> are stored as re-formatted data in the second database <u>in the PDA</u> to match the second database to the first database while the first application program is executed. Independent claim 33 also recites that the first application program, the conversion program and the second application program <u>are initiated and executed on the PDA</u>, the conversion program capable of converting data from any one of a plurality of application programs in the PDA into data in a format of any other of the plurality of application programs in the PDA.

For at least similar reasons as set forth above, Flanagin, Pendleton and Ellard do not teach or suggest at least these features of independent claim 33 relating to a personal data assistant. Thus, independent claim 33 defines patentable subject matter.

Accordingly, each of independent claims 1, 13, 18, 25 and 33 defines patentable subject matter. Each of the dependent claims depends from one of the independent claims and therefore defines patentable subject matter at least for this reason. In addition, the dependent claims recite features that further and independently distinguish over the applied references.

For example, dependent claim 9 recites that a delimiter between portions of data in the data block indicate a new data field. The Office Action states that Flanagin teaches database objects containing records for distinct APPs. The Office Action states that it is notoriously well known in the database art for <u>delimiters to be used in databases</u>. However, the delimiter recited in dependent claim 19 is provided with respect to <u>a selected data block</u>. This does not correspond to a delimiter in a database. Applicant respectfully submits that these features of dependent claim 9 are not taught in the prior art and/or are not taught in the prior art with respect to the personal information terminal. Applicants respectfully request the Patent Office supply a prior art reference showing features of dependent claim 9. Otherwise, the Patent Office fails to make a *prima facie* case of obviousness with respect to dependent claim 9. Thus, dependent claim 9 defines patentable subject matter.

Dependent claim 10 recites that a beginning of the data block includes an identifier code to identify the second application program in which to store the data. The Office Action cites Flanagin's paragraphs [0026] and [0028] for these features. However, these features do not teach

or suggest the features of dependent claim 10. For example, the cited paragraphs do not suggest an identifier code. Rather, the cited sections relate to description fields 28a. See FIG. 2. Flanagin has no suggestion for an identifier code and/or an identifier code to identify a second application program in which to store data. Flanagin does not suggest these features of dependent claim 10. Thus, dependent claim 10 defines patentable subject matter at least for this additional reason.

Dependent claim 32 recites that prescribed portions of the data to be converted contain identification markers to indicate the application program into which the reformatted data is to be stored, and wherein delimiters in the data indicate a beginning of at least one data field, wherein the input/output interface comprises a touch screen. For at least similar reasons as set forth above with respect to dependent claims 9-10, the applied references do not teach or suggest at least these features of dependent claim 32. Thus, dependent claim 32 defines patentable subject matter at least for this additional reason.

Dependent claim 37 recites that each of the first and second application programs are operated in the personal information terminal to respectively display data stored in the first and second application programs. The Office Action cites Flanagin's FIGs. 1, 5A, 5B, 5C for these features. However, Flanagin does not suggest the claimed operations of independent claim 18 provided within the mobile device 3A. Rather, as discussed above, Flanagin transfers data to the desktop computer 4. Thus, dependent claim 37 defines patentable subject matter at least for this additional reason.
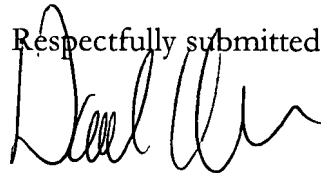
CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition

for allowance. Favorable consideration and prompt allowance of claims 1-21, 23-25, 27-35 and

37 are earnestly solicited. If the Examiner believes that any additional changes would place the

application in better condition for allowance, the Examiner is invited to contact the undersigned

attorney at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is

hereby made. Please charge any shortage in fees due in connection with the filing of this,

concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and

please credit any excess fees to such deposit account.

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